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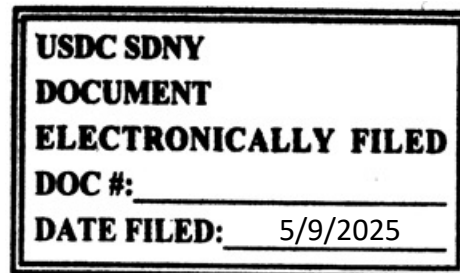
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May 8, 2025

VIA ECF

The Honorable Stewart D. Aaron, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007



Re: *Escamilla et al. v. 48 West 21st Street Corp. et al.*
Case No. 1:25-cv-00784-VSB-SDA

Dear Judge Aaron,

We represent Defendants 48 West 21st Street Corp. d/b/a Taj Lounge Restaurant, David Casey, Mark Philip Quilter, and Matthew Knott in this case. We write to Your Honor pursuant to the March 25, 2025 Order of the Honorable Vernon S. Broderick, U.S.D.J., referring this case to Your Honor for all general pretrial purposes (ECF 21). With Plaintiff's consent and pursuant to Section I.C. of Your Honor's Individual Practices, Defendants respectfully request a two-week extension of all deadlines under the April 7, 2025 Mediation Referral Order and an attendant two-week extension of Defendants' time to respond to Plaintiffs' first amended complaint.

Our firm was relatively recently substituted in as attorneys of record for Defendants 48 West 21st Street Corp., Casey, and Quilter. *See*, ECF 24, April 5, 2025. We were very recently (*i.e.* yesterday) substituted in as attorneys of record for the remaining Defendant, Knott. *See*, ECF 28, May 7, 2025. Simply put, more time is needed to coordinate with Plaintiffs' counsel and the Court-assigned Mediator on the tasks to be performed under the Mediation Referral Order, specifically the scheduling and conducting of the mediation session itself.

In addition, given our recent engagement, we require additional time in order to prepare a comprehensive response to the first amended complaint, now on behalf of all Defendants. In the spirit of the Mediation Referral Order, this requested extension will permit the parties to focus their time and resources on early mediation. Thus, we respectfully request an extension of time for Defendants to answer, move, or otherwise respond to Plaintiffs' first amended complaint until two weeks after the to-be scheduled mediation session. This is the third overall request for an extension of Defendants' time to respond to the first amended complaint and the second by our office. The prior requests were granted. We would have made this request earlier but again were only substituted in as attorneys of record for all Defendants just yesterday. Moreover, we wanted to ensure that we had conferred with Plaintiff's counsel and secured Plaintiff's consent to this request, which consent was confirmed earlier today.

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Thus, we respectfully request that the deadlines set forth in the Mediation Referral Order be extended by two weeks and that the time for Defendants to answer, move, or otherwise respond to Plaintiffs' first amended complaint be extended to two weeks following the parties' mediation session.

Finally, we note that earlier today, Your Honor issued an Order scheduling an Initial Conference for June 16, 2025. Given the terms of the Mediation Referral Order, referring this case to mediation under Local Civil Rule 83.9 prior to the case management conference pursuant to a Fed. R. Civ. P. 16(b), and the requests for extensions of time made herein, Defendants also respectfully request an attendant adjournment of the June 16, 2025 Initial Conference. We have reached out to Plaintiffs' counsel for their position on this discrete request, but likely due to the recency of the issuance of the Order, have not yet received a response.

We appreciate the Court's attention to these matters and are available to the Court should it have any questions.

Respectfully submitted,

GORDON REES
SCULLY MANSUKHANI, LLP

/s/ David J. Grech

David J. Grech
Andrew J. Varvaro

Cc.: All attorneys of record (via ECF)
Court-appointed Mediator (via email)
Adam I. Kleinberg (via email)

Defendants' letter motion (ECF No. 30) is GRANTED IN PART and DENIED IN PART. The deadline for Defendants to respond to the First Amended Complaint is extended *nunc pro tunc* until June 30, 2025. The Initial Pretrial Conference currently scheduled for June 16, 2025, is adjourned *sine die*. The Court does not set the schedule for mediation submissions. The parties must address matters related to the mediation to the court-appointed mediator.

SO ORDERED.

Dated: May 9, 2025

